

# **Exhibit F**

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## UNITED STATES BANKRUPTCY COURT OF NEW JERSEY

Case No. 23-12825

- - - - - x  
In re: :

LTL MANAGEMENT LLC, :  
:  
Debtor, :

- - - - - -x  
LTL MANAGEMENT LLC, :  
:  
Plaintiff, :

v. :  
:

THOSE PARTIES LISTED ON APPENDIX A :  
TO COMPLAINT and JOHN AND JANE DOES: :  
1-1000, :  
:  
Defendants. :

- - - - - -x

April 17, 2023  
1:12 p.m.  
7 Times Square  
New York, NY

VIDEOTAPED AND REMOTE DEPOSITION UPON  
ORAL EXAMINATION OF ANDY BIRCHFIELD, ESQ., held  
at the above-mentioned time and place, before  
Randi Friedman, a Registered Professional  
Reporter, within and for the State of New York.

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<p>1 A. Birchfield, Esq.</p> <p>2 A Yes. 13:26:38</p> <p>3 Q They have been since October 2021; 13:26:38</p> <p>4 correct? 13:26:40</p> <p>5 A Except for a very brief -- 13:26:41</p> <p>6 Q Two hours? 13:26:43</p> <p>7 A Yes. 13:26:43</p> <p>8 Q And you're aware from your 13:26:45</p> <p>9 participation in the MDL that in September of 13:26:47</p> <p>10 2020, Judge Wolfson ordered the formation of -- 13:26:51</p> <p>11 an administration of a common benefit fund for 13:26:54</p> <p>12 the payment of fees and expenses incurred in 13:26:58</p> <p>13 connection with the MDL correct? 13:27:01</p> <p>14 A I'm aware that a common benefit fee 13:27:03</p> <p>15 order was entered. I couldn't give you the date. 13:27:06</p> <p>16 Q Sometime around the September 2020 13:27:11</p> <p>17 time frame? 13:27:13</p> <p>18 A I don't dispute that. I don't know. 13:27:16</p> <p>19 Q It was sometime before the LTL 13:27:18</p> <p>20 bankruptcy was commenced in October of 2021; 13:27:21</p> <p>21 correct? 13:27:24</p> <p>22 A Yes. 13:27:24</p> <p>23 Q And you're generally familiar with the 13:27:25</p> <p>24 terms of that agreement? 13:27:27</p> <p>25 A Yes. 13:27:28</p>	<p>1 A. Birchfield, Esq.</p> <p>2 MR. HAAS: No. If you want to 13:28:42</p> <p>3 object, object. If you want to instruct him 13:28:43</p> <p>4 not to answer, do so. 13:28:45</p> <p>5 BY MR. HAAS: 13:28:46</p> <p>6 Q Answer the question. 13:28:47</p> <p>7 A When you say up to that amount, I 13:28:48</p> <p>8 would agree with that. It would not be that 13:28:50</p> <p>9 amount because there are -- there were different 13:28:53</p> <p>10 provisions where firms could agree early on and 13:29:00</p> <p>11 there would be a lesser percentage. So it's not 13:29:04</p> <p>12 12 percent across the board. 13:29:07</p> <p>13 Q You're referring to, let's say, 13:29:08</p> <p>14 Paragraph 24 of the order, which states that if 13:29:09</p> <p>15 you participate early on, the contribution 13:29:11</p> <p>16 percentage would be 8 percent, not 12 percent; 13:29:15</p> <p>17 right? Is that what you're referring to? 13:29:19</p> <p>18 A I'm not sure of the paragraph. I 13:29:20</p> <p>19 didn't review it, you know -- I didn't review it 13:29:22</p> <p>20 for this deposition. I'm not disputing that. 13:29:26</p> <p>21 I'm talking to you in terms of -- I'm testifying 13:29:28</p> <p>22 in terms of in my general understanding of the 13:29:31</p> <p>23 common benefit. 13:29:34</p> <p>24 Q So your general understanding is that 13:29:36</p> <p>25 the range of fees that could be contributed to 13:29:38</p>
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<p>1 A. Birchfield, Esq.</p> <p>2 Q Okay. So pursuant to the common 13:27:29</p> <p>3 benefit order that Judge Wolfson entered, up to 13:27:36</p> <p>4 12 percent of any amount recovered on talc claims 13:27:39</p> <p>5 in the MDL is assigned to a common benefit; 13:27:42</p> <p>6 right? 13:27:47</p> <p>7 A Could be, yes. My understanding is 13:27:48</p> <p>8 it's -- 10 percent fee is 2 percent cost. 13:27:51</p> <p>9 Q Right. So let's say, for example, in 13:27:55</p> <p>10 the MDL, if the settlement was obtained for 13:27:58</p> <p>11 \$8.9 billion, the common benefit fund would be up 13:28:02</p> <p>12 to \$1.068 billion, which is 12 percent; right? 13:28:07</p> <p>13 MS. SLOCUM: Objection. You're 13:28:12</p> <p>14 asking him to speculate as to a settlement 13:28:12</p> <p>15 in the MDL which did not occur. 13:28:15</p> <p>16 MR. HAAS: I'm asking him to 13:28:18</p> <p>17 answer the question of whether or not he 13:28:19</p> <p>18 would agree that if there's a settlement in 13:28:20</p> <p>19 the MDL, which is a gross recovery amount in 13:28:21</p> <p>20 the MDL, up to 12 percent of that would go 13:28:25</p> <p>21 into the common benefit fund, and that 13:28:30</p> <p>22 number is, I'll represent for the record, is 13:28:32</p> <p>23 1.068 billion. 13:28:33</p> <p>24 MS. SLOCUM: Objection. The 13:28:38</p> <p>25 court's order states what it is, okay. 13:28:39</p>	<p>1 A. Birchfield, Esq.</p> <p>2 the common benefit fund is anywhere from 13:29:41</p> <p>3 8 percent to 12 percent of the gross recovery 13:29:44</p> <p>4 amount, depending upon whether or not the 13:29:48</p> <p>5 individual firms were early participation or not? 13:29:51</p> <p>6 A Yes. 13:29:56</p> <p>7 Q So that would be anywhere between 13:29:56</p> <p>8 \$712 million or \$1.068 billion for 8.9 gross 13:29:58</p> <p>9 recovery amount; right? 13:30:05</p> <p>10 A I'm trusting your math. I can't do 13:30:08</p> <p>11 that in my head. 13:30:11</p> <p>12 Q Okay. 13:30:11</p> <p>13 A Not quickly, anyway. 13:30:12</p> <p>14 Q And that gross recovery amount that is 13:30:14</p> <p>15 put into the common benefit fund is then provided 13:30:19</p> <p>16 to those firms that provide common benefit work 13:30:25</p> <p>17 product for the MDL; correct? 13:30:30</p> <p>18 A As a general rule, you know, that is 13:30:34</p> <p>19 true. I mean, typically what would happen when a 13:30:36</p> <p>20 court enters a common benefit assessment award 13:30:39</p> <p>21 like this, then there would be, you know, a 13:30:42</p> <p>22 determination, you know, at the back end about, 13:30:45</p> <p>23 you know, the amount -- the amount of the overall 13:30:50</p> <p>24 pot, the overall common benefit fund amount. And 13:30:54</p> <p>25 then that amount would be overseen by, you know, 13:31:00</p>

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<p>1 A. Birchfield, Esq.</p> <p>2 an Article III judge to determine, you know, what 13:31:04</p> <p>3 is an appropriate, you know, allocation of those 13:31:07</p> <p>4 funds. And that's -- you know, that is the 13:31:09</p> <p>5 typical way, you know, that from my experience 13:31:13</p> <p>6 the common benefit fees are -- you know, are 13:31:16</p> <p>7 handled. 13:31:19</p> <p>8 So the first determination is, okay, 13:31:19</p> <p>9 the order is entered, and the order is entered 13:31:22</p> <p>10 to -- you know, as an approximation of what would 13:31:25</p> <p>11 be necessary, the court at the end would 13:31:29</p> <p>12 determine if that is appropriate, and if so, then 13:31:34</p> <p>13 begin the allocation process among the lawyers 13:31:37</p> <p>14 who did the work on behalf of the other 13:31:39</p> <p>15 claimants. 13:31:42</p> <p>16 Q And the allocation of that amount 13:31:45</p> <p>17 among the lawyers that did the work depends upon 13:31:47</p> <p>18 what common benefit work they did; correct? 13:31:51</p> <p>19 A Yes. 13:31:54</p> <p>20 Q Okay. And the plaintiff steering 13:31:54</p> <p>21 committee that's in the MDL is tasked with the 13:31:58</p> <p>22 responsibility of identifying who should do that 13:32:02</p> <p>23 common benefit work; right? 13:32:04</p> <p>24 A As a general -- as a general 13:32:06</p> <p>25 principle, yes. 13:32:08</p>	<p>1 A. Birchfield, Esq.</p> <p>2 versus, you know, Ashcraft &amp; Gerel or Levin 13:33:05</p> <p>3 Papantonio and Mr. Tisi versus Mr. Golomb. So to 13:33:08</p> <p>4 say vast majority, I think, is more than -- 13:33:14</p> <p>5 that's farther than I can go at this point. 13:33:16</p> <p>6 Q Beasley Allen tracks those amounts; 13:33:18</p> <p>7 right? 13:33:20</p> <p>8 A Beasley Allen -- Beasley Allen tracks, 13:33:23</p> <p>9 you know, the work that we do for the, you know, 13:33:26</p> <p>10 for the MDL. 13:33:30</p> <p>11 Q Do you provide any reports? 13:33:31</p> <p>12 A I don't. 13:33:33</p> <p>13 Q Do you know whether Beasley Allen 13:33:34</p> <p>14 does? 13:33:35</p> <p>15 A I'm not sure. I mean, Ms. O'Dell is 13:33:36</p> <p>16 co-lead and -- 13:33:41</p> <p>17 Q Do you have -- 13:33:43</p> <p>18 A She's co-lead of the MDL. 13:33:43</p> <p>19 Q You're the head of the mass torts 13:33:45</p> <p>20 litigation practice at Beasley Allen, are you 13:33:47</p> <p>21 not? 13:33:47</p> <p>22 A I am. 13:33:49</p> <p>23 Q Do you have any sense of whether or 13:33:49</p> <p>24 not Beasley Allen has a claim to be the largest 13:33:50</p> <p>25 percentage of the common benefit fund based on 13:33:54</p>
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<p>1 A. Birchfield, Esq.</p> <p>2 Q And Beasley Allen sits on that 13:32:09</p> <p>3 plaintiff steering committee; correct? 13:32:11</p> <p>4 A Correct. 13:32:13</p> <p>5 Q And Beasley Allen to date, you would 13:32:14</p> <p>6 agree with me, has performed the vast majority of 13:32:19</p> <p>7 the common benefit work product incurred, 13:32:22</p> <p>8 according to Beasley Allen, the largest 13:32:24</p> <p>9 percentage of the common benefit expenses; right? 13:32:28</p> <p>10 MS. SLOCUM: Objection. That's 13:32:30</p> <p>11 requiring work product. 13:32:32</p> <p>12 MR. HAAS: No, it's not. It's a 13:32:35</p> <p>13 fact. 13:32:36</p> <p>14 BY MR. HAAS: 13:32:36</p> <p>15 Q Go ahead, you can answer. 13:32:37</p> <p>16 MS. SLOCUM: Objection still 13:32:38</p> <p>17 stands. 13:32:38</p> <p>18 BY MR. HAAS: 13:32:39</p> <p>19 Q You can answer. 13:32:39</p> <p>20 A I'm not trying to avoid or be evasive 13:32:42</p> <p>21 here in any way. I mean, has Beasley Allen done, 13:32:46</p> <p>22 you know, a substantial amount of the, you know, 13:32:50</p> <p>23 the work in the MDL? Yes. Sitting here, me 13:32:53</p> <p>24 personally, I cannot give you an answer about how 13:32:59</p> <p>25 much, you know, Beasley Allen has done, you know, 13:33:01</p>	<p>1 A. Birchfield, Esq.</p> <p>2 fees and work done to date? 13:33:57</p> <p>3 A That would be the determination of -- 13:34:00</p> <p>4 of an Article III judge if it is administered 13:34:03</p> <p>5 through the MDL court. 13:34:07</p> <p>6 Q Based upon the work done to date, is 13:34:09</p> <p>7 it Beasley Allen's position that it has 13:34:11</p> <p>8 undertaken the largest percentage of the common 13:34:16</p> <p>9 benefit work and incurred the largest percentages 13:34:20</p> <p>10 of the expenses to date? 13:34:23</p> <p>11 MS. SLOCUM: Objection. Asked and 13:34:24</p> <p>12 answered. 13:34:24</p> <p>13 MR. HAAS: No, it's not. 13:34:25</p> <p>14 BY MR. HAAS: 13:34:25</p> <p>15 Q You can answer. 13:34:26</p> <p>16 MS. SLOCUM: He did. He 13:34:26</p> <p>17 already -- 13:34:27</p> <p>18 MR. HAAS: That was not asked. He 13:34:28</p> <p>19 can answer. 13:34:29</p> <p>20 MS. SLOCUM: He answered. 13:34:30</p> <p>21 BY MR. HAAS: 13:34:31</p> <p>22 Q You can answer. Go ahead. 13:34:32</p> <p>23 A If you're asking my opinion as we sit 13:34:33</p> <p>24 here today, my opinion is probably so. 13:34:35</p> <p>25 Q Yeah. 13:34:38</p>

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1 A. Birchfield, Esq.  
2 co-counsel arrangements with Mr. Ferrer and his 13:53:12  
3 firm. 13:53:17  
4 Nick Johnson, I'm not aware of -- I'm 13:53:19  
5 not aware of any cases where we have co-counsel 13:53:22  
6 arrangements. 13:53:27  
7 So who else? 13:53:29  
8 Q Adam Pulaski? 13:53:32  
9 A Adam Pulaski we do have. We do have 13:53:33  
10 co-counsel arrangements with Mr. Pulaski. 13:53:37  
11 Q Okay. Anyone else, sitting here 13:53:40  
12 today? 13:53:41  
13 A No. I mean, if you want to -- if you 13:53:47  
14 want to tell me who else? 13:53:50  
15 Q We can march it through. If you don't 13:53:53  
16 recall, that's fine, I'll move on. I just want 13:53:57  
17 to get your understanding and your recollection. 13:54:00  
18 A I don't know of anyone -- I don't know 13:54:04  
19 of anyone else, but if you want to ask me about 13:54:07  
20 specific ones, I'd be glad to answer. 13:54:09  
21 Q Okay. So circling back, you testified 13:54:11  
22 that Allen Smith had a litigation financing 13:54:15  
23 arrangement with respect to the talc claims for 13:54:19  
24 which you are co-counsel. Do you understand the 13:54:20  
25 terms of those litigation financing arrangements? 13:54:22

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1 A. Birchfield, Esq.  
2 A No. 13:54:25  
3 MS. SLOCUM: I'm going to -- 13:54:25  
4 BY MR. HAAS: 13:54:26  
5 Q Do you have an understanding of the 13:54:26  
6 financing company? Who it is? 13:54:28  
7 A I'm not certain. 13:54:39  
8 Q Are you familiar with MHR? 13:54:40  
9 A MHR? Are you talking about -- is MHR 13:54:42  
10 a financing for -- 13:54:51  
11 Q I'm asking the question. Are you 13:54:53  
12 familiar? 13:54:55  
13 A That does not -- 13:54:56  
14 Q So your testimony is you have no 13:55:00  
15 understanding of which entity is financing the 13:55:02  
16 talc claims that Allen Smith is a co-counsel with 13:55:07  
17 you? 13:55:10  
18 A I'm saying that I am not certain. 13:55:12  
19 Q Who do you think it is? 13:55:15  
20 MS. SLOCUM: Objection. Are you 13:55:20  
21 asking him to speculate or guess? 13:55:21  
22 MR. HADDAD: Mr. Haas, you have to 13:55:26  
23 let other people finish. You're making it 13:55:27  
24 very difficult -- 13:55:29  
25 MS. SLOCUM: Let me finish my 13:55:30

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1 A. Birchfield, Esq.  
2 objection. You're asking him to take a 13:55:30  
3 guess. The witness has testified he doesn't 13:55:32  
4 know. He's not familiar. You put out a 13:55:33  
5 name, MHR. He either knows -- 13:55:36  
6 If you don't know, say you don't 13:55:39  
7 know. 13:55:40  
8 THE WITNESS: I don't know. 13:55:41  
9 BY MR. HAAS: 13:55:42  
10 Q You said you weren't sure. Do you 13:55:42  
11 have any sense -- that's a fact question. Do you 13:55:44  
12 have any sense of who it is? 13:55:46  
13 MS. SLOCUM: Objection, vague. I 13:55:48  
14 don't even know what that means, "any 13:55:49  
15 sense." 13:55:51  
16 BY MR. HAAS: 13:55:51  
17 Q You may answer, sir. 13:55:52  
18 A Are you talking about at any point in 13:55:53  
19 time? 13:55:57  
20 Q Yeah. I'll take whatever testimony 13:55:58  
21 you have. 13:56:00  
22 A I mean, I understand that, you know, 13:56:01  
23 that, you know, at one point Fortress, but I 13:56:04  
24 can't -- I can't say that with certainty. And I 13:56:10  
25 wouldn't want to guess. 13:56:20

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1 A. Birchfield, Esq.  
2 Q Aside from Fortress, are you aware of 13:56:21  
3 any other litigation financing entity that is 13:56:23  
4 providing financing for the talc claims for which 13:56:25  
5 you have co-counsel? 13:56:29  
6 A No. 13:56:31  
7 Q Shifting over to the claims for which 13:56:33  
8 you do not have co-counsel, are the talc claims 13:56:35  
9 that Beasley Allen represents securitization or 13:56:40  
10 collateralization for any loan provided to 13:56:45  
11 Beasley Allen? 13:56:47  
12 MS. SLOCUM: Objection. I'm going 13:56:48  
13 to instruct the witness not to answer that. 13:56:50  
14 MR. HAAS: On what grounds? 13:56:52  
15 MS. SLOCUM: Relevance. 13:56:54  
16 MR. HAAS: On relevancy? You're 13:56:54  
17 instructing on a relevancy instruction? 13:56:56  
18 MS. SLOCUM: Yeah. 13:56:58  
19 MR. HAAS: Let me be absolutely 13:56:58  
20 clear what your instruction is. You're 13:57:00  
21 instructing the witness not to answer on 13:57:02  
22 relevance? 13:57:03  
23 MS. SLOCUM: Also on work product. 13:57:05  
24 MR. HAAS: Now it's work product? 13:57:06  
25 MS. SLOCUM: I'll do both. Allie 13:57:08

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<p>1 A. Birchfield, Esq.</p> <p>2 A They returned a verdict -- a defense 16:37:18</p> <p>3 verdict. You asked me if I knew how long it took 16:37:20</p> <p>4 and I said I do not know. You asserted that it 16:37:22</p> <p>5 was less than an hour. I said I don't dispute 16:37:24</p> <p>6 that. 16:37:26</p> <p>7 Q All right. We're good. Let's talk 16:37:27</p> <p>8 about the Forrest case. 16:37:29</p> <p>9 Do you know where that case was tried? 16:37:30</p> <p>10 A I believe the Forrest case was also 16:37:34</p> <p>11 tried in St. Louis, but I cannot say that with 16:37:38</p> <p>12 certainty. 16:37:40</p> <p>13 Q And just before I move to the Forrest 16:37:41</p> <p>14 case, in terms of the Giese, Trentman and Vogeler 16:37:44</p> <p>15 case, you had co-counsel in that case; right, 16:37:47</p> <p>16 sir? 16:37:50</p> <p>17 A Yes. 16:37:50</p> <p>18 Q All right. And was Ashcraft &amp; Gerel 16:37:51</p> <p>19 involved in that case with you folks? Michelle 16:37:56</p> <p>20 Parfitt? 16:38:01</p> <p>21 A Michelle Parfitt has served as 16:38:04</p> <p>22 co-counsel in some of these trials and has put on 16:38:07</p> <p>23 experts. I'm not sure. I cannot say with 16:38:11</p> <p>24 certainty. I believe she was involved in the 16:38:13</p> <p>25 Giese trial, but I cannot say that with 16:38:15</p>	<p>1 A. Birchfield, Esq.</p> <p>2 BY MS. BROWN: 16:39:03</p> <p>3 Q All right. And in the Forrest case, 16:39:04</p> <p>4 you and your team put before the jury a request 16:39:05</p> <p>5 for medical expenses of approximately 16:39:09</p> <p>6 \$260,000.00; right, sir? 16:39:11</p> <p>7 MR. O'DELL: Object to the form. 16:39:14</p> <p>8 Which case? 16:39:15</p> <p>9 MS. SLOCUM: Object to the form. 16:39:16</p> <p>10 MS. BROWN: We're up to Forrest. 16:39:17</p> <p>11 We're going down the list. 16:39:20</p> <p>12 MS. O'DELL: Excuse me. 16:39:22</p> <p>13 MS. BROWN: No worries. 16:39:23</p> <p>14 BY MS. BROWN: 16:39:24</p> <p>15 Q Is that right, sir, if you look where 16:39:24</p> <p>16 the Fortress line is on the chart? 16:39:27</p> <p>17 A Yes. 16:39:28</p> <p>18 Q All right. And that jury awarded \$0; 16:39:28</p> <p>19 right? 16:39:30</p> <p>20 A Yes. 16:39:30</p> <p>21 Q That was also a defense verdict in the 16:39:31</p> <p>22 City of St. Louis; right? 16:39:33</p> <p>23 A Yes. 16:39:35</p> <p>24 Q And in terms of the Fox, Giannecchini, 16:39:35</p> <p>25 Ristesund and Slempt cases, all of those cases 16:39:40</p>
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<p>1 A. Birchfield, Esq.</p> <p>2 certainty. 16:38:18</p> <p>3 Q Okay. Certainly Allen Smith was 16:38:18</p> <p>4 involved; right? He opened and closed in that 16:38:20</p> <p>5 case? 16:38:22</p> <p>6 A That's my understanding, yes. 16:38:23</p> <p>7 Q Okay. And he's the one who has the 16:38:23</p> <p>8 funding from Fortress; right? 16:38:26</p> <p>9 MR. HADDAD: Objection to the 16:38:31</p> <p>10 form. 16:38:32</p> <p>11 MS. SLOCUM: Objection to the 16:38:32</p> <p>12 form. 16:38:32</p> <p>13 THE WITNESS: To the best of my 16:38:34</p> <p>14 view, that's my understanding. 16:38:35</p> <p>15 BY MS. BROWN: 16:38:36</p> <p>16 Q The Forrest case, your team was also 16:38:37</p> <p>17 teamed up with Allen Smith on that case as well; 16:38:41</p> <p>18 right, sir? 16:38:44</p> <p>19 A I think that's correct. 16:38:46</p> <p>20 Q And I thought there were also some 16:38:47</p> <p>21 folks from the Onder firm, too; right? 16:38:49</p> <p>22 MS. SLOCUM: Objection to form. 16:38:52</p> <p>23 Is that a question? 16:38:56</p> <p>24 THE WITNESS: I believe the Onder 16:38:58</p> <p>25 law firm, you know, served as local counsel. 16:38:59</p>	<p>1 A. Birchfield, Esq.</p> <p>2 were reversed on appeal; right? 16:39:44</p> <p>3 A Yes. I mean, you know, the Fox 16:39:48</p> <p>4 verdict was a 72 million-dollar verdict. The 16:39:52</p> <p>5 Giannecchini, I believe, was 55. Ristesund, I 16:39:55</p> <p>6 believe, was -- I believe that was 70. And 16:40:02</p> <p>7 Slempt, maybe 110. I believe that's correct. 16:40:07</p> <p>8 Those cases -- those cases were vacated based on 16:40:10</p> <p>9 the BMS Supreme Court decision on personal 16:40:15</p> <p>10 jurisdiction. But those cases -- so those cases 16:40:18</p> <p>11 are refiled and currently pending. 16:40:22</p> <p>12 Q Right. But in terms of what's 16:40:25</p> <p>13 important to an individual claimant, right, the 16:40:26</p> <p>14 amount of money that ultimately went to these 16:40:29</p> <p>15 individuals, it was \$0; right, sir? 16:40:33</p> <p>16 MS. BROWN: Objection to form. 16:40:36</p> <p>17 MR. HADDAD: Objection. 16:40:37</p> <p>18 THE WITNESS: So far. So far. 16:40:37</p> <p>19 BY MS. BROWN: 16:40:38</p> <p>20 Q And the Brower case that case you 16:40:39</p> <p>21 listed here for medical bills of 1.2 million 16:40:41</p> <p>22 dollars; right, sir? 16:40:44</p> <p>23 A Yes. 16:40:46</p> <p>24 Q All right. And that case ended in a 16:40:46</p> <p>25 mistrial; right? 16:40:49</p>


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8	***		
9	EXHIBITS		
10	Birchfield		
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11	Exhibit 1	Email	65
12	Exhibit 2	Email Exchange	65
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14	Exhibit 4	Value of Ovarian Cancer Claims	144
15	Exhibit 5	Talcum Powder Verdicts	161
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18			
	Exhibit 8	Susan Vogeler Document	185
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	(Exhibits were retained by reporter.)		
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1	A. Birchfield, Esq.
2	MARKED QUESTIONS
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4	2)Page 118, Line 20
5	3)Page 123, Line 3
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1	A. Birchfield, Esq.
2	CERTIFICATION
3	I, Randi Friedman, Registered
4	Professional Reporter and Notary Public of the
5	State of New York, do hereby certify:
6	THAT, the witness whose testimony is herein
7	before set forth, was duly sworn by me, and
8	THAT, the within transcript is a true record of
9	the testimony given by said witness.
10	I further certify that I am not related
11	either by blood or marriage to any of the parties
12	to this action; and that I am in no way
13	interested in the outcome of this matter.
14	IN WITNESS WHEREOF, I have hereunto set my
15	hand this 18th day of April, 2023.
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19	Randi Friedman, RPR
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1	ERRATA SHEET
2	VERITEXT/NEW YORK REPORTING, LLC
3	CASE NAME: In Re: LTL Management, LLC. v.
4	DATE OF DEPOSITION: 4/17/2023
5	WITNESSES' NAME: Andy Birchfield
6	PAGE
7	LINE (S)
8	CHANGE
9	REASON
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22	Andy Birchfield
23	SUBSCRIBED AND SWORN TO BEFORE ME
24	THIS ____ DAY OF _____, 20__.
25	(NOTARY PUBLIC) MY COMMISSION EXPIRES: